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The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 21B
New York, NY 10007-1312

By Hand and ECF

March 6, 2015

ICBC (London) plc v. The Blacksands Pacific Group, Inc., Index No. 15 Civ. 0070 (LAK) (FM)

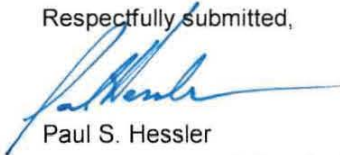
Dear Judge Kaplan:

We represent Plaintiff and Counterclaim-Defendant ICBC (London) plc.

ICBC has two motions pending before the court in this matter: a motion for summary judgment (originally filed in New York State Court as a motion for summary judgment in lieu of complaint, which Defendant The Blacksands Pacific Group, Inc. ("Blacksands") removed to this court), and a motion to dismiss the counterclaims filed by Blacksands and an affiliate, Blacksands Pacific Alpha Blue, LLC. The motion for summary judgment was fully briefed on February 13, and we are today filing our reply brief on our motion to dismiss.

Pursuant to Your Honor's Individual Rules of Practice, I write to inform Your Honor that counsel for the parties have conferred, and are available for oral argument regarding both pending motions on each of the following six Monday mornings, save for this coming Monday, March 9, 2015.

Respectfully submitted,



Paul S. Hessler
On Behalf of ICBC (London) plc

cc (by email): Kevin J. Fee, Esq., Kornstein Veisz Wexler & Pollard, LLP

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